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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)	CASE NO. CR 17-0378 RS
)	
14 Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME FROM AUGUST 22, 2017 TO
15 v.)	OCTOBER 3, 2017
)	
16 ROBERT GUEVARA AND)	
17 LILLIAN HOVAN,)	
)	
18 Defendants.)	

19 **STIPULATION**

20 IT IS HERBY STIPULATED by the parties, through undersigned counsel, that:

21 1. The defendants, ROBERT GUEVARA, represented by Severa Keith, Esquire, and
22 LILLIAN HOVAN, represented by Ethan A. Balogh, Esquire, and the government, represented by
23 Denise Oki, Special Assistant United States Attorney, appeared before the Court on August 22, 2017,
24 for a status conference. The Court, after hearing the status in this case, scheduled a further status
25 hearing for October 3, 2017, the date proposed by counsel.

26 2. The parties requested that time be excluded under the Speedy Trial Act between August
27 22, 2017, and October 3, 2017, because the continuance is necessary for effective preparation of
28

1 counsel, taking into account the exercise of due diligence. Specifically, the time requested for exclusion
2 will allow counsel for the defendants to obtain and review the discovery in this case.

3
4 IT IS SO STIPULATED.

5 DATED: August 23, 2017

BRIAN J. STRETCH
United States Attorney

7
8 /s/
DENISE M. OKI
Special Assistant United States
9 Attorney

10 DATED: August 23, 2017

11 /s/
12 SEVERA KEITH
13 Counsel for ROBERT GUEVARA

14 DATED: August 23, 2017

15 /s/
16 ETHAN A. BALOGH
17 Counsel for LILLIAN HOVAN

18
19 **~~PROPOSED~~ ORDER**
20

21
22 Based upon the representation of counsel and for good cause shown, the Court finds that failing
23 to exclude the time between August 22, 2017, and October 3, 2017, would unreasonably deny the
24 defendants the reasonable time necessary for effective preparation, taking into account the exercise of
25 due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by
26 excluding the time between August 22, 2017, and October 3, 2017, from computation under the Speedy
27 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS
28 HEREBY ORDERED that the time between August 22, 2017, and October 3, 2017, shall be excluded

1 from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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4 DATED: 8/24/17


RICHARD SEEBORG
United States District Judge